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23 COMPANY

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28 UNITED STATES DISTRICT COURT
UNITED STATES DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29
30 UNITED STATES OF AMERICA,
31 Plaintiff,
32 v.
33 PACIFIC GAS AND ELECTRIC COMPANY,
34 Defendant.

35 Case No. 14-CR-00175-WHA

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1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this memorandum
 2 in connection with its filing of errata concerning (a) PG&E’s Wildfire Safety Plan (Dkt. 1004-1),
 3 (b) PG&E’s Response to Order to Show Cause Why PG&E’s Conditions of Probation Should Not Be
 4 Modified (Dkt. 976), and (c) PG&E’s Response to Notice Re California Wildfires (Dkt. 956).

5 On February 6, 2019, PG&E filed its Wildfire Safety Plan pursuant to the Court’s Order dated
 6 January 30, 2019 (Dkt. 992). PG&E’s Wildfire Safety Plan was provided to the California Public
 7 Utilities Commission (“CPUC”) pursuant to Senate Bill 901 (“SB 901”) earlier that day. On
 8 February 12, 2019, PG&E submitted to the CPUC an errata to correct Attachment E of the Wildfire
 9 Safety Plan. On February 14, 2019, PG&E submitted to the CPUC an amendment to the Wildfire Safety
 10 Plan. PG&E is attaching the errata and amendment as Exhibits A and B.

11 On January 23, 2019, PG&E filed its Response to Order to Show Cause Why PG&E’s
 12 Conditions of Probation Should Not Be Modified (Dkt. 976). PG&E has identified a correction to that
 13 filing. Lines 3-5 on page 36 should be changed from “In 2017 alone, PG&E removed an additional
 14 approximately 156,000 dead or dying trees, and in 2018, it removed an additional approximately 120,000
 15 dead or dying trees.” to “In 2017 alone, PG&E removed an additional approximately 156,000 dead or
 16 dying trees, and in 2018, it removed an additional approximately 70,000 dead or dying trees.”

17 Finally, on December 31, 2018, PG&E filed its Response to Notice Re California Wildfires
 18 (Dkt. 956). This submission included factual reports and supplemental factual reports concerning the
 19 Camp Fire and the October 2017 North Bay Wildfires (Exhibits A, L-AAA, respectively). Upon further
 20 review of the relevant documentation, PG&E has identified certain corrections to the supplemental
 21 factual reports concerning some of the October 2017 North Bay Wildfires.¹ Attached as Exhibit C is an
 22
 23

24 ¹ PG&E is continuing to identify and collect documents relevant to the Camp Fire in response to data
 25 requests from regulators and other third parties, including the CPUC, the California Department of
 26 Forestry and Fire Protection (“CAL FIRE”), the California Independent System Operator (“CAISO”), the
 27 Butte County District Attorney and its Monitor. To the extent necessary, PG&E will provide an errata
 28 for the Camp Fire factual report once PG&E has identified all relevant underlying documentation and
 substantially completed its responses to these requests.

1 errata sheet prepared with respect to the supplemental fact reports for the following fires: Adobe, Honey,
2 LaPorte, Lobo, Maacama, McCourtney, Norrbom, Nuns, Oakmont, Point, Potter Valley and Redwood.

3
4 Respectfully Submitted,

5 Dated: February 14, 2019

6
7 JENNER & BLOCK LLP,

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9 By: /s/ Reid J. Schar
10 Reid J. Schar (*pro hac vice*)

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